

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Petition of NSTAR Gas Company for Approval of its  
Long-Range Load Forecast and Resource Plan for the  
five-year period 2001/02 through 2005/06 pursuant  
to G.L. c. 164, §§ 69I, *et seq.*

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D.T.E. 02-12

**ATTORNEY GENERAL'S FIRST SET OF  
DOCUMENT AND INFORMATION REQUESTS**

The following are the Attorney General's First Set of Document and Information Requests in the above captioned proceeding.

**INSTRUCTIONS**

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to NSTAR Gas Company or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide four copies of each response.
16. The term "Company" refers to NSTAR Gas Company. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

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AG-1-1	Please provide the Energy Facilities Siting Council Standard Tables G-1 through G-24, separately for each of the Company's gas service areas (Cambridge, New Bedford, and Worcester/Framingham).
AG-1-2	How does the Company incorporate in its monthly, weekly and daily gas dispatch and planning activities the load and swings that any large gas user (i.e., an electric generating facility) served directly by an interstate pipeline may exhibit. Identify such customers and explain how the Company and the pipeline and/or the user communicate. Fully describe what, if any, operational problems may be encountered due to these large users.
AG-1-3	Has the Company imposed a moratorium on new connections or customer conversions in the past 10 years (1992-2001)? If yes, please provide a detailed explanation of each instance. Explain the conditions that required the moratorium and the conditions that allowed the lifting of the moratorium. The response must identify the specific geographic area affected, the specific constraint(s) and the specific remedies.
AG-1-4	During the past 10 years (1992-2001) has the Company offered any incentives to existing customers to convert to gas heat or incentives to attract new customers to use gas? If yes, please provide the details (amount of the incentive, target customer group, effective dates etc.) of each of these efforts. Identify, for each of the past 10 years, the geographic area where incentives were offered, the number of conversions and/or new customers, by customer class, that were obtained through the incentive program and the estimated annual and peak day therm usage

of these customers. Identify and describe (amount of the incentive, target customer group, effective dates etc.) any incentive programs that are currently in place and any that are planned--provide the geographic area for each program.

- AG-1-5 How does the Company evaluate the adequacy of its distribution system? Provide copies of all analyses completed during the past 5 years (1998-present). Include all supporting documentation, calculations and assumptions. Indicate who prepared each analysis (Company department or division, consultant) and identify the purpose (capital budget, project approval, marketing department analysis, regulatory filing, etc.). To the extent that the analyses do not clearly discuss problem areas (areas where there may be delivery problems under certain conditions), please provide these details.
- AG-1-6 For each of the Company's gas service areas, what is the maximum level of growth that can be accommodated by the current in-service distribution system. Compare this maximum growth level to the growth for each gas service area that the Company has incorporated in Supply filing. If the Company is projecting growth in excess of that which can be reliably served by the current distribution system, how and when will the Company expand the system to accommodate the projected growth. Please provide all analyses and planning documents that support planned distribution system expansions for the period 2001-2006.
- AG-1-7 How would the Company provide service to current transportation customers should they return to sales service and the Company were required to acquire additional pipeline capacity and/or supplies? Assuming different return rates of 25%, 50% and 100%—would the response be different? If yes, please explain. Would the Company include the costs of additional resources in its CGA or would it consider collecting these costs directly from the returning customers?
- AG-1-8 How has the Company accounted in its plan (load and supply) for the service it will be providing to the Kendall generating facility in Cambridge? Provide the details regarding the historic level gas provided to Kendall and the estimated level during the period covered by the Plan. Describe in detail how the gas and the related distribution facilities are priced to Mirant. Include all regulatory filings and approvals related to provision of service to Kendall.
- AG-1-9 In addition to the Kendall generating facility, does the Company have any other large customers that it serves under special contracts? If yes, please describe each such customer and the volume of gas consumed during each of the past 5 years and estimated annual volumes for the forecast period. Provide a synopsis of each of the customer's special contract: term of the contract, pricing provisions, terms of delivery (firm, interruptible, conditions for interruption), and whether sales or transportation only customer.

- AG-1-10 Refer to page 74 of the Plan. Please provide the details of all “other available alternatives (e.g., sharing arrangements with industrial and electric generation facilities)” that the Company has available to it currently and those that it may put into place during the term of the Plan. Include the location of such facilities, the volumes available to the Company, the conditions under which the volumes are available, the cost of the arrangement (fixed and variable) and how these costs are recovered from customers. Provide a copy of each contract (original and all amendments) with alternative suppliers.
- AG-1-11 Refer to page 79 of the Plan. Please provide the details of the mitigation margins during 1999 and 2000 broken down by type: off system sales, capacity release, specific asset optimization strategies and capacity management payments. If these amounts were subject to margin sharing, provide the total received and the amount flowed through to customers.
- AG-1-12 Please provide the details of the mitigation margins during 2001 broken down by type: off system sales, capacity release, specific asset optimization strategies and capacity management payments. If these amounts were subject to margin sharing, provide the total received and the amount flowed through to customers.
- AG-1-13 Please provide the details of the Company’s estimates of mitigation margins for 2002 (and beyond) broken down by type: off system sales, capacity release, specific asset optimization strategies and capacity management payments. If these amounts are subject to margin sharing, provide estimated receipts and the estimated flow through to customers.
- AG-1-14 Refer to page 84 of the Plan. Please explain whether the Company gave notice to extend or terminate the DTI storage and the related transportation agreements. Provide all analysis supporting the Company’s decision.
- AG-1-15 Has the Company sought the Department’s further guidance as to whether it should renew transportation and supply agreements for periods beyond the five year transition period indicated in the Gas Unbundling Order? If yes, please provide the specifics of the contacts made with the Department and the responses received. Will the Company seek Department approval of any contract extensions or terminations that it makes during the transition period? Please explain the basis for the response.
- AG-1-16 Refer to page 92 of the Plan. Please provide a copy of the capacity management agreement with Dynegy and the Department’s approval. Include all analyses done by the Company or its consultants in evaluating the Dynegy proposal relative to alternatives. Provide all supporting workpapers, assumptions and calculations.

- AG-1-17 Please provide all agreements between the Company and its affiliate(s) related to the pricing of services provided by the LNG facilities in Hopkinton and Acushnet. Include copies of all Department approvals related to these services.
- AG-1-18 Please provide copies of the tables that are embedded in the text of the Plan to replace the tables with truncated values.
- AG-1-19 Refer to Table III-8. Please explain in detail how the values used for the January Cold Snap were determined. Include all supporting calculations, workpapers and assumptions. What would the result be if the cold snap had utilized consecutive dates of increasing EDD instead of the increasing/decreasing pattern shown—assume January 16 and 17 were increasing EDD January 18 the peak (80 for Cambridge, 74 for New Bedford and 84 for Worcester/Framingham)?

Dated: May 13, 2002